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Via ECF

November 3, 2022

The Honorable Dan Aaron Polster
Carl B. Stokes United States Court House
801 West Superior Avenue, Courtroom 18B
Cleveland, Ohio 44113-1837

**Re: In re: National Prescription Opiate Litigation, Case No.
1:17-MD-2804**

Dear Judge Polster:

We are counsel for McKesson Corporation. We write in response to the Court's October 7 Order Regarding Non-Litigating Defendants (Doc. No. 4670) and the Status Report filed by Masters Pharmaceutical, LLC on November 1, 2002 (Doc. No. 4712), insofar as they concern "River City Pharma."

In 2018, McKesson purchased the assets (but not the liabilities) of Masters Pharmaceutical, LLC. The McKesson subsidiary that holds those assets—Masters Drug Company, Inc.—is a released entity under the Distributor Settlement.¹ River City Pharma is a trade name (or d/b/a) for Masters Drug Company, Inc.² Masters Drug Company, Inc. d/b/a River City Pharma has not distributed controlled substances at any time since the 2018 asset purchase.

Pursuant to the terms of the Distributor Settlement releasing Masters Drug Company, Inc., River City Pharma has been dismissed by this Court from five cases brought by subdivision plaintiffs. *See* Dkt. Nos. 4307, 4307-1.³ Additional cases naming "River City Pharma" have been dismissed by the Utah courts pursuant to the Distributor Settlement.

To the best of the undersigned counsel's knowledge, (1) there are three cases brought by non-governmental plaintiffs pending in this MDL that name River City Pharma as a defendant,⁴

¹ *See* Section I.HHH and Exhibit J of the Distributor Settlement Agreement, Dkt. No. 4304-2.

² For the avoidance of doubt, no McKesson entity is an affiliate of Masters Pharmaceutical, LLC or River City Pharma, LLC.

³ The dismissed cases are: 1:19-op-45050-DAP, 1:19-op-45462-DAP, 1:19-op-45925-DAP, 1:19-op-45993-DAP, and 1:20-op-45016-DAP.

⁴ *See* 1:18-op-45390-DAP, 1:18-op-45493-DAP, and 1:18-op-45819-DAP.

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(2) Masters Drug Company, Inc. has not been served in any of those cases, and (3) there are no cases naming River City Pharma or Masters Drug Company, Inc. pending in state court.

Sincerely,

/s/ Geoffrey Hobart

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